



Montana Fish, Wildlife & Parks

4600 Giant Springs Rd.
Great Falls, MT 59405

February 2, 2018

Dear Interested Party:

The enclosed draft Environmental Assessment (EA) has been prepared regarding a potential six-year grazing lease proposal on the Beartooth Wildlife Management Area (BTWMA). The 36,000-acre BTWMA is located in west-central Montana along the western and northern edge of the Big Belt Mountains, occupying land in both Lewis & Clark and Cascade Counties.

The proposed grazing lease would utilize principles of rest-rotation and spot treatment grazing to maintain and/or enhance wildlife habitat for the resource and public benefit on approximately 9,520 acres of the BTWMA. Additionally, the proposed lease would incorporate 26,300 deeded Sieben Live Stock, 2,200 acres BLM and 320 acres DNRC lands into the grazing system. This cooperative effort would allow FWP to maintain and enhance habitat for wildlife and fisheries over a large landscape adjacent to the BTWMA. Total project area encompasses about 38,340 acres of private and public lands.

Specifically, this proposed grazing plan is designed to improve habitat quality and quantity for a variety of wildlife species, particularly elk, mule and white-tailed deer, ruffed and dusky grouse and a variety of nongame wildlife species. Livestock grazing has been utilized as a habitat management tool on the BTWMA in a similar fashion with adjacent and cooperating lessee Sieben Live Stock Company since 1992.

Additional copies of the draft EA are available at Montana Fish, Wildlife & Parks in Great Falls at (406) 454-5840. The draft EA is also available on Montana Fish, Wildlife & Parks' website at <http://fwpr4publiccom@mt.gov>. A 30-day public review and comment period will be available February 5 – March 6, 2018. A public hearing/meeting is not scheduled. Written comment should be delivered to the following address:

Montana Fish, Wildlife & Parks
BTWMA Grazing Proposal - Cory Loecker
4600 Giant Springs Rd.
Great Falls, MT 59405

Or: E-Mail: fwpr4publiccom@mt.gov (Include BTWMA Grazing Proposal in Subject Heading)

Thank you for your interest and involvement,

Graham Taylor
Montana Fish, Wildlife & Parks
Region 4 Wildlife Manager
Great Falls, MT

Enclosed: Draft Beartooth WMA Grazing Lease Proposal Environmental Assessment



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MONTANA FISH, WILDLIFE & PARKS - REGION 4 WILDLIFE DIVISION

ENVIRONMENTAL ASSESSMENT OF GRAZING LEASE ON PORTION OF BEARTOOTH WILDLIFE MANAGEMENT AREA February 2018

In accordance with the Montana Environmental Policy Act, Montana Fish, Wildlife & Parks (FWP) is required to assess the impacts that any proposal or project might have on the natural and human environments. Further, FWP's land lease-out policy, as it pertains to the disposition of interest in Department lands (89-1-209) requires and Environmental Assessment (EA) to be written for all new grazing leases, lease extensions or lease renewals.

A. PROJECT LOCATION

The 36,000-acre Beartooth Wildlife Management Area (BTWMA) is in west-central Montana along the western and northern edge of the Big Belt Mountains (Figure 1). The BTWMA was purchased by Montana Fish, Wildlife & Parks to provide: (1) yearlong habitat requirements of resident wildlife, including elk, bighorn sheep, mule deer, white-tailed deer, antelope, black bear, game birds and non-game wildlife (2) winter range for migratory elk, mule deer, white-tailed deer, bighorn sheep and (3) public outdoor recreational opportunities, especially hunting. Montana Fish, Wildlife & Parks purchased the BTWMA in 1970 from the M. Pierce Milton estate (32,320 acres). The Whitetail Prairie addition to the BTWMA was purchased from Voegele's Inc. in 2014 (3,680 acres).

The Wildlife Management Area (WMA) occupies land in both Lewis & Clark and Cascade Counties. Major drainages, including Cottonwood, Elkhorn and Willow Creeks flow into Holter Lake, an impoundment on the Missouri River. Secondary tributaries to the Missouri River also located in the project area include Frazier and Wegner Creeks. This rugged, mostly mountainous area ranges from 3,578 to 6,917 feet in elevation. The largest portion of the BTWMA lies in Lewis & Clark County; but lands do extend into Cascade County. Helena is approximately 24 air miles to the south-southwest and is 49 miles via roadways. The nearest town is Wolf Creek, which is 14 miles from the WMA Headquarters. Legal description of FWP lands included in this grazing lease proposal is included in Appendix A.

Figure 1. Beartooth Wildlife Management Area Location.



B. PROJECT NEED AND AREA DESCRIPTION

Principles of rest-rotation and/or spot treatment grazing would continue to be used to maintain and/or enhance wildlife habitat for the resource and public benefit. Specifically, this grazing plan is designed to improve habitat quality and quantity for a variety of wildlife species, particularly elk, mule and white-tailed deer, ruffed and dusky grouse and a variety of nongame wildlife species. Project need, area descriptions and further details included in Exhibit A.

C. GOALS/OBJECTIVES

- * Promote succession of desired native plant species into areas previously abused by domestic livestock grazing which occurred prior to FWP acquisition in 1970.
- * Promote plant production, vigor and nutrient content.
- * Increase the attractiveness of spring, summer and late fall forage to elk, thereby influencing distribution and minimizing depredation to adjacent private lands.
- * Implement a long term, beneficial grazing system on lands described on a large portion of elk range in the upper Tyrrell, Cottonwood, Elkhorn and Wegner Creek drainages.
- * Expand the effective influence of the BTWMA for wintering elk by bringing adjacent private land into similar management, simultaneously meeting Landowner needs and tolerance.
- * Heal bare ground and reduce/stop soil loss
- * Enhance growth and restoration of desirable plant species
- * Utilize hoof action of livestock to break soil crust and plant seeds in the “graze after seed ripe” treatment
- * Stimulate root structure and build drought resistance through rest periods of the system

Other management goals and objectives of the BTWMA address such issues as elk depredations on neighboring private lands, fisheries management, hunting and recreational activities, deed restrictions addressing management, subdivision and commercial use limitations. To provide maximum vegetative cover (abundance) and quality plant composition (nutrition/palatability) as related to wildlife needs and soil/watershed protection on native ranges associated with the BTWMA and adjoining private lands included in this proposal. Proposals for grazing of domestic livestock must meet the goals and objectives for management of the BTWMA as listed above and as described in the WMA Management Plan. Within the context of the objectives listed above, it is proposed that a Grazing Management Program be continued on portions of the BTWMA for habitat enhancement.

D. PROJECT SCOPE

Montana Fish, Wildlife & Parks is proposing to combine and expand two expiring livestock grazing leases on a portion of the Beartooth Wildlife Management Area for six-years (2019 - 2024). Principles of rest-rotation and/or spot treatment grazing would continue to be used to maintain and/or enhance wildlife habitat for the resource and public benefit. Specifically, this grazing plan is designed to improve habitat quality and quantity for a variety of wildlife species, particularly elk, mule and white-tailed deer, ruffed and dusky grouse and a variety of nongame wildlife species.

The two leases set to expire in 2018 are the “Polloch Meadows/Upper Cottonwood Creek Lease” and the “Cow Camp Lease”. Livestock from the same lessee and adjoining landowner Sieben Live Stock, have been utilized in

some fashion to improve vegetation conditions and health on a portion of the Beartooth WMA through grazing leases with the FWP since 1992.

It is proposed to incorporate both expiring leases into one lease, rather than the Department going through multiple grazing/agricultural lease public processes every six years on the same Wildlife Management Area. It is also proposed to include the Whitetail Prairie portion of the BTWMA into a portion of one of the two systems. The two systems are locally known as “Cow Camp” and “Cottonwood/Whitetail Prairie/Wegner”. These proposed grazing pastures are located in the northern portion of the WMA (Figures 2 & 3 in Exhibit A).

The systems would utilize one of two types of livestock grazing treatments: Rest Rotation Grazing or Spot Treatment Grazing. Wildlife habitat would be enhanced by resting, deferring and rotating cattle grazing on certain pastures at precise times, and by stocking the grazed pastures at levels that will ensure that the condition of the upland and riparian plant communities is maintained and/or improved. Grazing practices must meet FWP’s minimum standards for grazing as defined in Appendix B.

Expiring leases lands included about 5,800 acres FWP lands and 15,600 acres Sieben Live Stock deeded lands. Sieben Live Stock has offered to include another 10,700 acres of deeded land in the system(s), in addition to the 15,600 deeded acres involved in expiring leases. This would greatly increase FWP’s ability to maintain and/or enhance habitat for wildlife and fisheries on a large landscape, not only on the WMA but on adjoining private lands. Proposed land included in the two grazing systems include:

	FWP - BTWMA	Sieben Live Stock	BLM	DNRC	SUM
Cow Camp	4,960	15,600	800	80	21,440
Cottonwood/WTP/Wegner	4,560	10,700	1,400	240	16,900
SUM ACRES	9,520	26,300	2,200	320	38,340
% of Total Acres	(25%)	(69%)	(5%)	(1%)	(100%)

Total FWP lands involved in the proposed lease is approximately 9,520 acres, which is about 26% of the total acreage of the Beartooth WMA. Livestock grazing is focused on the northern portion of the WMA to improve forage and habitat conditions primarily for elk, mule deer, white-tailed deer, mountain grouse, and nongame wildlife species. This area consists mostly of higher elevation habitats. Although these species use this area of the WMA year-round, most use comes during spring, summer and fall months. By design, the remaining 74% mid and southern portions of the WMA are not grazed by livestock. This area of the WMA also contains year-round wildlife habitat, but more importantly provides excellent big game winter range. Winter 2016/17, over 3,000 elk, 300 white-tails, 200 mule deer and 75 antelope utilized winter range habitats on the WMA. Grazing system locations and details are further detailed in Exhibit A.

PUBLIC ACCESS

In exchange for grazing FWP lands involved in this proposed lease, Sieben Live Stock also agrees to continue to allow reasonable free public hunting on their deeded lands during Fish and Wildlife Commission approved seasons. Sieben Live Stock has been enrolled in FWP’s Block Management Program since the programs’ inception. Sieben Live Stock has 68,400 acres enrolled in FWP’s Block Management Program and provides at least 1,500 public hunter days annually for all big game species and sexes and is a model Landowner to area sportspeople.

SPECIAL CONDITIONS

As per FWP’s WMA Grazing Lease Payment Schedule Guidelines, this proposed lease agreement would fall under the “Exchange of Use” or a fee of \$0.00 per AUM. Criteria used to determine this fee is that as part of FWP’s standard grazing rotation, the lessee effectively exchanges resting 1 pasture of private land (C Treatment) for use of 1 pasture of WMA land (A or B Treatment) every 2 of 3 years. On the 3rd year, the lessee does not exchange rest, but maintains structured grazing treatments (A and B treatments), but FWP receives the value of having the WMA pasture rested (C Treatment) —OR— As a direct exchange of grazing for rest, the lessee is

trading a yearlong rest treatment on private land for a grazing treatment of equal value on the WMA. In either of the two scenarios, the lessee's payment is in grass instead of cash. Exchange of Use Fee = \$0. The intent of \$0 Exchange of Use is NOT to expand the herd size through grazing on the WMA. It is instead to use the WMA as an incentive for managing livestock grazing in a manner that meets wildlife objectives. The WMA grazing lease incorporates private lands that provide important wildlife habitat values (as determined by FWP) and comprises a sizeable portion of the total grazing system (i.e., the private land supports two of the three grazing treatments annually and/or involves annual rest on private land in return for a similar amount of grazing on the WMA). The lessee also provides services and maintenance that at least meet minimums required to qualify for the low grazing rate as set forth in FWP's Grazing Lessee Responsibilities Document. Following these FWP guidelines in this proposed lease, the lessee provides almost 75% of the land base in the lease (deeded and public leases). With this proposed lease, FWP can maintain and/or enhance wildlife and fishery habitats on an additional 28,500 acres adjacent to the Beartooth WMA. Thus, the lessee would qualify for the Exchange of Use Fee = \$0.00

Salting, and/or mineral grounds will be the responsibility of the lessee. Salt/mineral grounds shall be placed at locations mutually agreed upon by the lessee and FWP. Sites are to be moved periodically to locations agreed upon by both parties. Spring/water developments will be considered on an as-needed basis and will be approved on any WMA lands upon agreement of both parties as in past leases.

The BTWMA / Sieben Live Stock Grazing System plan (Exhibit A) and lease document would be employed during the term of this lease. Other contingencies may apply to Bureau of Land Management (BLM) and Department of State Lands (DNRC) leases which are the responsibility of the lessee.

MONITORING/PUBLIC INVOLVEMENT:

Trends in vegetation composition and livestock use would continue to be monitored via photo plots and/or photos. Monitoring will be a cooperative effort by the Area Biologist and Range Specialist/Plant Ecologist. Owing to the keen public interest in the area, and its resources and accessibility, public education and informational efforts may be necessary to showcase the grazing pastures. In summer 2016, 23 photo points were established in the Whitetail Prairie portion of the BTWMA. Grazing transects are also located in the "Cow Camp" area and Sieben Live Stock lands. These photo points will be monitored to ensure wildlife and fishery habitats are maintained and/or enhanced through time.

E. ENVIRONMENTAL CHECKLIST

POTENTIAL IMPACTS ON PHYSICAL ENVIRONMENT

ITEM	MAJOR	MOD.	MINOR	NONE	UNK.	COMMENTS
Terrestrial & Aquatic Life & Habitats			X			X
Water Quality, Quantity & Distribution			X			X
Geology & Soil Quality, Stability & Moisture			X			X
Vegetation Cover, Quality, & Quantity			X			X
Aesthetics			X			X
Air Quality				X		
Demands on Environmental Resources of Land, Water, Air, & Energy				X		

F. EXPLANATION OF IMPACTS TO THE PHYSICAL ENVIRONMENT

TERRESTRIAL & AQUATIC LIFE AND HABITATS

While grazing, livestock will reduce the amount of forage in the area during the grazing lease period. It is expected that the project will have a positive long-term impact on range and wildlife habitat for elk, mule deer, whitetail deer and many non-game species of wildlife. Primary species to benefit from the grazing is expected to be elk. The anticipated positive impact is the removal of decadent residual vegetation, which should enhance both spring and fall green-up conditions. Green-up vegetative conditions provide more palatable and attractive vegetation conditions for wildlife. Sufficient forage is available to big game on the remainder of the WMA and the surrounding landscapes to offset any short-term loss of forage due to livestock use. Due to the time and duration of the proposed grazing lease, impacts to any non-game wildlife in the area should be minimal, although the reduction in residual cover could have a slight negative impact on ground nesting birds during dates of use. A minimum of two consecutive growing seasons of rest following a grazing treatment will greatly benefit these species in the long-term.

WATER QUALITY, QUANTITY AND DISTRIBUTION

Portions of Cottonwood, Tyrell, Wegner, Frazier, and Stickney Creek drainages are riparian habitats potentially affected by the proposed grazing treatment(s). Although the riparian vegetation within the treatment area will have some minor impacts during the periods of livestock usage, there should be no long-term effects. Hoof action from livestock grazing should provide a positive benefit to riparian soil quality by helping to break down old residual vegetative material, thereby, returning nutrients to the soil. Impacts on water quality, quantity and distribution will be minimal. The proposed grazing plan addresses riparian areas by implementing a minimum of two consecutive growing seasons (some even a minimum of two full years) of rest following a grazing treatment, which will greatly benefit riparian areas long-term.

GEOLOGY AND SOIL QUALITY, STABILITY, AND MOISTURE

Some impacts to soil conditions may occur due to trampling, trailing or grazing in localized, high use areas, especially around water tanks (if applicable) and salting areas. The grazing capacity estimate is believed to be a

conservative estimate, so the risk of overgrazing induced erosion should be minimal. Hoof action from livestock grazing should provide a positive benefit to soil quality by helping to break down old residual vegetative material, thereby, returning nutrients to the soil.

VEGETATION COVER, QUALITY, AND QUANTITY

While vegetation cover and quantity will be decreased while livestock are grazing the area, vegetation quality should dramatically increase following grazing treatment because of removing residual decadent plant material, allowing for two consecutive growing seasons of rest. Plant and soil disturbance as the result of grazing may enhance seed placement, germination, and seedling establishment for both desirable and undesirable plant species.

AESTHETICS

Domestic livestock and signs of livestock use on the BTWMA may be objectionable to some segments of the public. This area of the BTWMA generally receives minimal public use during the time of livestock presence due to pasture locations being 6-12 miles from the nearest public access point. Also, cattle will only be in the proposed pastures approximately 4-6 weeks during grazing treatment. Livestock grazing on the WMA and adjoining neighboring lands through FWP leases has been a customary practice since 1992. FWP has had a rest-rotation grazing lease with neighboring landowner Sieben Live Stock on 21,440 acres (16,480 acres SLS, 4,960 acres BTWMA) since 1992 that has proven very successful in enhancing vegetation and habitat conditions for wildlife. Two other smaller pastures (Polloch Meadows and Upper Cottonwood) portions of the WMA have been grazed under lease since 2006 and 2012 respectively to enhance wildlife habitat. Livestock has been used to treat the proposed pastures in some fashion since 2006, along with a rich history of livestock grazing in the area communities, thus public users of the WMA are accustomed to observing livestock in the area.

G. ENVIRONMENTAL CHECKLIST

POTENTIAL IMPACTS ON THE HUMAN ENVIROMENT

ITEM	MAJOR	MOD.	MINOR	NONE	UNK.	COMMENTS
Social Structures and Mores				X		
Cultural Uniqueness and Diversity				X		
Local and State Tax Base and Tax Revenue				X		
Agricultural or Industrial Production				X		
Human Health				X		
Access to & Quality of Recreational and Wilderness Activities			X			X
Quantity and Distribution of Employment				X		
Distribution and Density of Population and Housing				X		
Demands for Energy				X		
Locally Adopted Environmental Plans and Goals				X		
Transportation Network and Traffic Flows				X		

H. EXPLANATION OF IMPACTS TO THE HUMAN ENVIRONMENT

ACCESS TO AND QUALITY OF RECREATIONAL AND WILDERNESS ACTIVITIES

Livestock and livestock sign on FWP Wildlife Management Areas may seem out of place for some segments of the public. However, the WMA has historically, and currently, utilized livestock grazing to enhance vegetative conditions for wildlife species. Many of FWP's Wildlife Management Areas have grazing systems in place to improve habitat quality, quantity and conditions for wildlife species, with great success. In addition, the proposed area to be leased for grazing receives minimal public use during the summer, and livestock will be removed prior to the archery hunting season. Along with the "Grazing Stipulations and Terms of Payment" described in Exhibit A, FWP requires lessees to allow reasonable public hunting on their deeded lands during Fish & Wildlife Commission approved seasons as terms of any grazing lease. Sieben Live Stock has been enrolled in FWP's Block Management Program since the programs' inception. Sieben Live Stock has 68,400 acres enrolled in FWP's Block Management Program and provides at least 1,500 public hunter days annually for all big game species and sexes and is a model Landowner to area sportspeople.

A. DISCUSSION AND EVALUATION OF REASONABLE ALTERNATIVES

1. No action (no grazing lease) alternative:

- Decadent residual vegetation will increase and remain, the area will become increasingly unattractive to elk, other game and nongame wildlife species.
- Elk will likely use forage on adjacent private land in large numbers especially during the spring, early summer and winter time periods.

2. Proposed action (provide grazing lease) alternative:

- Reduction in decadent residual vegetation, which in turn improves forage conditions and availability in the long term.
- Soil and plant disturbance that will benefit seedling establishment of both desirable and possibly undesirable plant species.
- Provide for better fall and/or spring green-up vegetation for elk and other wildlife species
- Promote maximum plant production, vigor and nutrient content.

J. ENVIRONMENTAL ASSESSMENT CONCLUSION

It has been determined that no significant impacts to the physical and human environment will result due to the proposed action alternative, therefore an Environmental Impact Statement is not required.

K. SCHEDULED PUBLIC INVOLVEMENT

A 30-day public review and comment period will be available February 5 – March 6, 2018. A public hearing is not scheduled. Written comment should be delivered to the following address:

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After the 30-day public comment period, a Decision Notice will be produced by the FWP Region 4 Supervisor based on public input. The Decision Notice will be supplied to the Fish & Wildlife Commission for a final decision to approve/disapprove the proposed lease at their regularly scheduled meeting April 19, 2018.

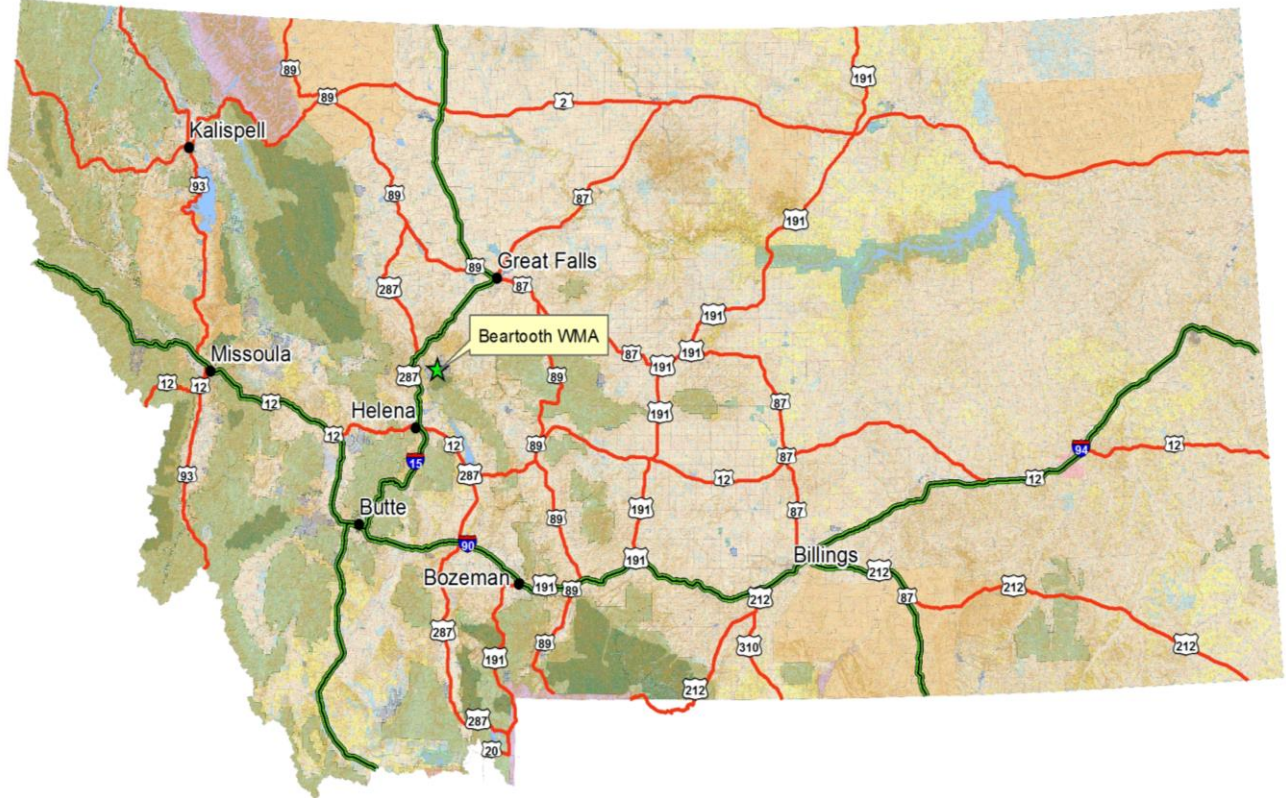
EXHIBIT A. FWP / SIEBEN LIVE STOCK GRAZING LEASE PROPOSAL

INTRODUCTION:

Montana Fish, Wildlife & Parks is proposing to combine and expand two expiring livestock grazing leases on a portion of the Beartooth Wildlife Management Area for six years (2019 - 2024). Principles of restoration and/or spot treatment grazing would continue to be used to maintain and/or enhance wildlife habitat for the resource and public benefit. Specifically, this livestock grazing proposal is designed to improve habitat quality and quantity for a variety of wildlife species, particularly elk, mule and white-tailed deer, ruffed and dusky grouse and a variety of nongame wildlife species.

The 36,000-acre Beartooth Wildlife Management Area (BTWMA) is located in west-central Montana along the western and northern edge of the Big Belt Mountains (Figure 1). The Wildlife Management Area (WMA) occupies land in both Lewis & Clark and Cascade Counties. Major drainages, including Cottonwood, Elkhorn and Willow Creeks flow into Holter Lake, an impoundment on the Missouri River. This rugged, mostly mountainous area ranges from 3,578 to 6,917 feet in elevation. The BTWMA was purchased in 1970 by Montana Fish, Wildlife & Parks from the M. Pierce Milton estate (32,320 acres). The Whitetail Prairie addition to the BTWMA was purchased from Voegelé's Inc. in 2014 (3,680 acres).

Figure 1. Beartooth Wildlife Management Area Location.



Management Goals and Objectives for the BTWMA include:

GOALS:

"To manage for highly productive, diverse plant communities that will provide quality forage and cover for native wildlife species, emphasizing elk, while providing opportunity for public hunting and other outdoor recreation."

Consistent with that goal, certain management objectives have been identified. They include (but are not limited to) the following:

"To provide the year-long habitat requirements of resident wildlife, including 500 elk, 100 bighorn sheep, 300 mule deer, 100 white-tailed deer, 50 antelope, black bear, game birds and non-game wildlife."

"To provide winter range for 5 1/2 months for an additional 1,000 elk, 200 mule deer and 100 white-tailed deer from surrounding public and private lands."

"To manage grassland vegetation, with emphasis on Rough Fescue (*Festuca scabrella*) and other native bunchgrass species, so that wildlife (particularly big game) species are provided abundant and nutritious forage."

GRAZING/VEGETATION OBJECTIVES:

- * Promote succession of desired native plant species into areas previously abused by domestic livestock grazing which occurred prior to FWP acquisition in 1970.

- * Promote plant production, vigor and nutrient content.

- * Increase the attractiveness of spring, summer and late fall forage to elk, thereby influencing distribution and minimizing depredation to adjacent private lands.

- * Implement a long term, beneficial grazing system on lands described in a sizeable portion of elk range in the upper Tyrrell, Cottonwood, Elkhorn and Wegner Creek drainages.

- * Expand the effective influence of the BTWMA for wintering elk by bringing adjacent private land into similar management, simultaneously meeting Landowner needs and tolerance.

- * Heal bare ground and reduce/stop soil loss.

- * Enhance growth and restoration of desirable plant species.

- * Utilize hoof action of livestock to break soil crust and plant seeds in the "graze after seed ripe" treatment.

- * Stimulate root structure and build drought resistance through rest periods of the system.

Other management goals and objectives of the BTWMA address such issues as elk depredations on neighboring private lands, fisheries management, hunting and recreational activities, deed restrictions addressing management, subdivision and commercial use limitations. To provide maximum vegetative cover (abundance) and quality plant composition (nutrition/palatability) as related to wildlife needs and soil/watershed protection on native ranges associated with the BTWMA and adjoining private lands included in this proposal.

Proposals for grazing of domestic livestock must meet the goals and objectives for management of the BTWMA as listed above and as described in the WMA Management Plan. Within the context of the objectives listed, it is proposed that a Grazing Management Program be continued on portions of the BTWMA for habitat enhancement.

The two leases set to expire in 2018 are the “Polloch Meadows/Upper Cottonwood Creek Lease” and the “Cow Camp Lease”. Livestock from the same lessee and adjoining landowner Sieben Live Stock, have been utilized in some fashion to improve vegetation conditions and health on a portion of the Beartooth WMA through grazing leases with the Department since 1992. Expiring leases lands included about 5,800 acres FWP lands and 15,600 acres Sieben Live Stock deeded lands.

It is proposed to incorporate both expiring leases into one lease, rather than the Department going through multiple grazing/agricultural lease public processes every six years on the same Wildlife Management Area. It is also proposed to include the Whitetail Prairie portion of the BTWMA into a portion of one of the two systems. The two systems are locally known as “Cow Camp” and “Cottonwood/Whitetail Prairie/Wegner”. These proposed grazing pastures are located in the northern portion of the WMA (Exhibits A and B). Legal description of the lands included in this proposal is detailed in Appendix A.

The systems would utilize one of two types of livestock grazing treatments: Rest Rotation Grazing or Spot Treatments. Wildlife habitat would be enhanced by resting, deferring and rotating cattle grazing on certain pastures at precise times, and by stocking the grazed pastures at levels that will ensure that the condition of the upland and riparian plant communities is maintained and/or improved. Grazing practices must meet FWP’s minimum standards for grazing as defined in Appendix B. A minimum of two years of growing season rest in three years (some pastures at least two complete years of rest and may never receive growing season grazing) will ensure long term health of plant communities.

Sieben Live Stock has offered to include another 10,700 acres of deeded acres in the proposed system(s), in addition to the 15,600 acres involved in expiring leases for a total of 26,300 acres of private lands. This would greatly increase FWP’s ability to maintain and/or enhance habitat for wildlife and fisheries on a large landscape, not only on the WMA but on adjoining private lands. Sieben Live Stock’s partnership with FWP has mutual benefits. With the combined acreages acting as one large system, Sieben Live Stock can completely rest one-third of enrolled summer range annually. A second third of summer range is rest during the growing season. This allows the private as well as the public lands to receive adequate rest during a 3-year rotation in a rest-rotation grazing system. Both private and public lands achieve improved range health which helps both parties meet ecological goals. Resting one third of summer range each year builds in drought resistance on both public and private land. The third rested all year insures there is one year’s stockpiled forage each spring. The two thirds rested during the growing season builds resilience during the growing season, which is the most sensitive time to graze. A spot-treatment approach private/public land cooperative effort allows more grazing options to become available on other portions of the lessee’s deeded lands, which allows increase rest periods on those acres. Direct benefits for Sieben Live Stock include more grazing acres and more options for grazing and land improvement. Both public and private lands are assured of enhanced management that benefits grass, soil and watershed. Wildlife, livestock, the range resource, and ultimately the community all mutually benefit.

Land to be included in the two proposed grazing systems include:

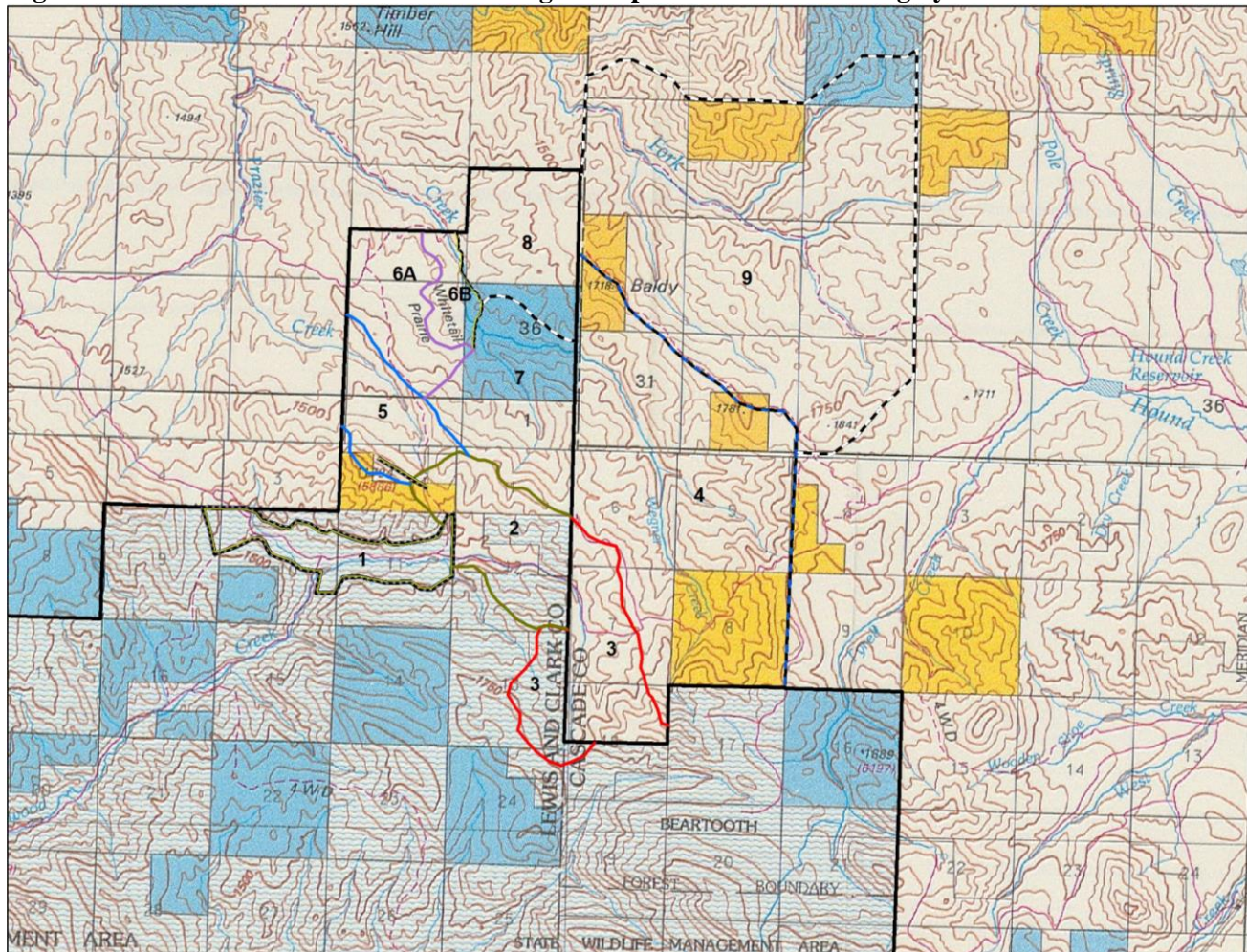
	FWP - BTWMA	Sieben Live Stock	BLM	DNRC	SUM
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SUM ACRES	9,520	26,300	2,200	320	38,340
% of Total Acres	(25%)	(69%)	(5%)	(1%)	(100%)

Total FWP lands involved in the proposed lease is approximately 9,520 acres, which is about 26% of the total acreage of the Beartooth WMA and 25% of the proposed grazing system. Livestock grazing is focused on the northern portion of the WMA to improve forage and habitat conditions primarily for elk, mule deer, white-tailed deer, mountain grouse, and nongame wildlife species. This area consists mostly of higher elevations habitats. Although these species use this area of the WMA year-round, most use comes during spring, summer and fall months. By design, the remaining 74% mid and southern portions of the WMA are not grazed by livestock. This area of the WMA also contains year-round wildlife habitat, but more importantly provides excellent big game winter range. Winter 2016/17, over 3,000 elk, 300 white-tails, 200 mule deer and 75 antelope utilized winter range habitats on the WMA. Grazing system locations and details are further defined in this document.

PROJECT AREA DESCRIPTION - “COTTONWOOD, WHITETAIL PRAIRIE, WEGNER”

This portion of the proposed grazing system incorporates approximately 16,900 acres (10,700 SLS / 4,560 FWP / 1,400 BLM / 240 DNRC), see Figure 2. The area includes portions of the Cottonwood, Wegner, Stickney and Frazier Creek drainages, which are tributaries of the Missouri River and lands on BTWMA and Sieben Live Stock.

Figure 2. “Cottonwood/Whitetail Prairie/Wegner” Spot Treatment Grazing System Pasture Locations.



Various areas within the BTWMA were seeded to domestic grasses prior to FWP's acquisition of the WMA, specifically the "Polloch Meadows" area of the Cottonwood Creek drainage. Domestic grass species included Timothy and Smooth Brome. From 1987-1990, a grazing system in Polloch meadows was attempted, with limited success (Table 1). Without livestock use, these tame grasses became very unpalatable during most times of the year, especially for winter forage for deer and elk. Several years of non-use by livestock and minimal use by elk resulted in stands of rank, minimally productive vegetation. Residual plant material that built up over time limited and/or delayed annual growth. This residual vegetation limited the amount of new (more succulent) plant growth available to deer and elk, especially during spring and fall months. By periodically manipulating these sites through livestock grazing, a range of habitat conditions can be maintained and enhanced, while ensuring vegetation and soil health goals are met. Livestock grazing is one management tool that can be utilized to address these surface litter conditions. Other goals are to promote maximum plant production, vigor and nutrient content, along with increasing the attractiveness of late fall and spring forage to wildlife species, especially elk and deer. Upper meadow areas near timber line consist primarily of rough fescue, Idaho fescue and bluebunch wheatgrass. Riparian areas of Cottonwood Creek consist of aspen, dogwood, willow, birch, black cottonwood, Rocky Mountain maple and chokecherry. As mentioned, the Polloch Meadows grazing system was revisited and implemented in 2006 having much success improving smooth brome palatability. Stocking rates and grazing timing has much improved the effectiveness of the system as compared to attempts in 1987.

The Upper Cottonwood area is a northerly facing slope which is primarily used during summer and fall months by elk and deer, along with other wildlife species. The pasture includes the "headwaters" of Cottonwood Creek. Native grass species including rough fescue, Idaho fescue and bluebunch wheatgrass are the primary focus. North facing timber stands consist mainly of lodgepole pine and Douglas fir, along with an aspen community in/around the headwaters of Cottonwood Creek. Prior to 2012, the area had not been manipulated by livestock and had copious amounts of residual cover. Removing this old litter stimulated regrowth, improved vegetative conditions, vigor and range health. This, in turn, is now much more attractive to wildlife species, especially elk.

In 2006, in the "Polloch Meadows" area of the BTWMA, a single 475-acre pasture grazing treatment was implemented to improve forage quality. This system has greatly enhanced the palatability of the remnant introduced hay fields (consisting of mostly smooth brome). The 6-year grazing lease expired in 2011. From 2012-2017, the lease was renewed and expanded to include a 400-acre pasture near Upper Cottonwood Creek on BTWMA. The lease was renewed with a one-year lease expiring in 2018.

Table 1. BTWMA Polloch Meadows Grazing Treatments, 1987-1990.

Year	Grazing Dates	AUM's	Cost/AUM	Grazing Fee
1987	8/1 – 9/15	269	\$1.35	\$453.94
1988	Rest	0	N/A	0
1989	8/1 – 9/15	316	\$1.86	\$587.76
1990	Rest	0	N/A	0

Table 2. BTWMA Polloch Meadows Grazing Treatments 2006 – 2018.

Year	Treatment	AUM's	Grazing Dates	Grazing Fee
2006	A	464	5/18 – 6/29	\$3,480
2007	C	Rested due to fire	N/A	\$0
2008	A	510	6/3 - 6/30	\$3,825
2009	B	341.7	7/17-8/19	\$2,562.84
2010	C	Rested	N/A	\$0
2011	A	440.3	5/27 – 6/20	\$3,302
2012	B	486	7/19 – 8/15	\$3,392.25
2013	C	Rested	N/A	\$0

2014	A	276	5/19-6-19	\$2,180.00
2015	B	279	7/8 – 8/21	\$2,204.10
2016	C	Rested		\$0
2017	A	453	5/19 – 7/13	\$3,578.70
2018	B	scheduled		

Approximate Grazing Treatment Dates: 475 ACRES

A = Full Season Grazing (May 15-July 1)

B = Post Seed Ripe Grazing (July 1-August 31)

C = Complete Rest

Table 3. BTWMA Upper Cottonwood Pasture Treatments 2012 – 2018.

Year	Treatment	AUM's	Grazing Dates	Grazing Fee
2012	A	487	6/28 – 7/18	\$1,005.75
2013	B	190	8/14 – 9/4	\$1,501.00
2014	C	Rested	N/A	\$0
2015	A	261	5/27 – 7/7	\$2,061.90
2016	B	219	6/28 – 7/0	\$1,730.10
2017	C	Rested		
2018	A	scheduled		

Approximate Grazing Treatment Dates: 400 ACRES

A = Full Season Grazing (May 15-July 1)

B = Post Seed Ripe Grazing (July 1-August 31)

C = Complete Rest

The “Whitetail Prairie” portion of the Beartooth WMA consists of native intermountain habitats. Whitetail Prairie, accounting for 3,680 acres, was purchased by FWP in 2014 as an addition to the Beartooth WMA. Sieben Live Stock held a livestock grazing lease on these acres from 1982-2014. The lease was terminated when FWP purchased the property from the Voegelé family. This area of the WMA is primarily used by wildlife species during spring, summer and fall months. Winter ranges for big game, mostly elk, are located on wind swept ridges. Primary rangeland grasses such as bluebunch wheatgrass, Idaho fescue, rough fescue, green needlegrass, timothy, bluejoint, Kentucky bluegrass, basin wildrye, cheatgrass, western wheatgrass, thickspike wheatgrass and prairie junegrass. Some forb species found on the area include western yarrow, sagewort, arrowleaf balsamroot, lupine, hairy goldenaster and pussytoes. Shrubs species including skunkbrush, snowberry, wild rose, chokecherry, serviceberry, dogwood, bitterbrush, creeping juniper, silver sagebrush and Wyoming big sagebrush are present. Conifer and deciduous tree species common to the area include Douglas fir, ponderosa pine, limber pine, lodgepole pine, Rocky Mountain juniper, black cottonwood, willow, hawthorn, birch, Rocky Mountain maple and quaking aspen. Whitetail Prairie encompasses portions of three perennial streams (Frazier, Wegner and Cottonwood Creeks), which are tributaries of the Missouri River. Habitats on adjoining Sieben Livestock lands are similar to the Whitetail Prairie portion of the WMA.

The 12,340 deeded and leased acres of Sieben Live Stock incorporates portions of the Cottonwood, Wegner and Stickney Creek drainages, which flow to the Missouri River. Primary grassland, forb and tree species in this area are nearly identical to the Whitetail Prairie. The landscape changes quickly from lush creek bottom and riparian stringers to steep, rugged mountainous terrain. Pasture sizes and locations are indicative to these features. Water is a limiting factor for livestock in some of this area.

Due to complex nature of the system, logistics in relation to ranching headquarters, water resources and terrain, flexibility is key in the first 6 years of this lease proposal. Pastures fences may have to be slightly altered and water developed to address cattle use, distribution and requirements of the lease proposal to ensure needs of wildlife habitat are met. Flexibility is critical in effective operation of a grazing system of this magnitude and of such public interest.

HABITAT GRAZING SYSTEM STIPULATIONS

Due to the rough topography in this area, yearling cattle have worked very well in the past to achieve grazing objectives and will most likely continue to do so. This does not prohibit the lessee from using cow/calf pairs in place of yearling cattle to achieve the same desired results. Dates of grazing use will be dictated by 1) plant phenology to include spring green-up and plant availability and 2) forage consumption in the active pasture and 3) hunting and recreational demands upon the area (out of BTWMA/WTP by Sept 1 due to archery seasons). Due to the complex ecosystem that exists in this area, “spot treatment” grazing will be utilized to meet and exceed FWP’s minimum standards of grazing. Based on grass, forb and woody species demands in a given pasture, livestock may be used differently in each pasture. It is felt that this “spot treatment” approach is best suited in maintaining long term quality wildlife and fishery habitats in this part of the BTWMA and adjoining private lands. Extended rest periods of pastures after use is key in maintaining quality riparian habitats along with proper plant root establishment and maintenance in these drier sites.

It is expected that general season dates for these events will approximate the following: May 15 – July 1 for full season grazing (early treatments), July 1 – August 31 for post seed ripe grazing (late treatments). Followed by a year of complete “Rest” (no livestock grazing). “Late” treatments may not occur past September 1 on FWP lands due to archery hunting season. Late treatments may run into September and October on Sieben Live Stock lands as livestock are shifted from the higher elevations northerly towards ranch Headquarters for winter months. Table 4 illustrates proposed spot treatment grazing sequences and pasture identification(s).

The BTWMA boundary has permanent fence construction. Within the proposed grazing system there is a permanent high tensile fence separating pasture #'s 2, 3 from pasture #4, and pasture #4 from #9. All other pasture designs are constructed using temporary electric poly wire fence. It may be necessary as the system is evolving to identify areas where permanent high tensile fence may need to be constructed for better livestock control in riparian areas (instead of temporary fencing). The lessee will be required to provide labor and materials to install temporary electric poly wire fence on pasture boundaries where permanent fence does not exist to implement the grazing system. Temporary electric poly wire fence may also be used to prevent overuse of riparian areas when pastures are scheduled for grazing. The lessee will also be responsible for both temporary and permanent fence maintenance in the pastures, cattle movement during active grazing seasons, and prevent and remedy trespass livestock problems if they arise. After each grazing rotation, the lessee will be required to remove the temporary electric fence each of those years within 3 days after cattle are removed from the pasture. The lessee may access the area via motorized travel from adjoining private lands to conduct such activities along with routine livestock checks. Another consideration in this new system is there may be a need for water improvements (tanks) for better livestock distribution, especially in the northern portion of the area. Should any fence and/or water developments be considered on FWP lands, it will be mutually agreed upon by FWP and the Landowner and may be cost shared by such. The Landowner may improve water resources on their deeded lands at their discretion. FWP may provide technical assistance if requested. The lessee will be required to maintain all livestock watering systems including costs of operating such.

Table 4. Proposed Sequence of Grazing Treatments and Pasture Identification, 2019-2024.

Pasture ID	2019	2020	2021	2022	2023	2024	Acres
1 – Polloch Meadows	Rest	Early	Early	Rest	Early	Rest	450
2 – Cottonwood Main	Rest	Early	Rest	Rest	Late	Rest	800
3 - Upper Cottonwood	Rest	Rest	Early	Rest	Rest	Early	1,025
4 – Wegner Basin	Rest	Late	Rest	Rest	Late	Rest	2,925
5 – WTP Frasier Creek	Rest	Late	Rest	Rest	Early	Rest	525
6a – WTP Main	Late	Rest	Rest	Early	Rest	Rest	550
6b – WTP Wegner Cr. West	Rest	Rest	Rest	Late	Rest	Rest	300
7 – WTP Jackleg	Rest	Rest	Late	Rest	Rest	Early or Late	825
8- WTP Wegner Cr. East	Late	Rest	Rest	Rest	Rest	Rest	800
9- Stickney Cr.	Early	Rest	Rest	Early	Rest	Late	8,700
SUM ACRES							16,900

WTP = FWP Whitetail Prairie

PROJECT AREA DESCRIPTION - “COW CAMP”

In 1992, on the BTWMA and adjoining Sieben Live Stock lands, a 3-pasture, rest-rotation grazing system was implemented on 21,440-acres (Cow Camp Lease). Half of Pasture 1 is located on the BTWMA, with the remainder on Sieben Live Stock lands. Pastures 2 & 3 of the system are located entirely Sieben Live Stock private lands. Bureau of Land Management Lands (BLM) incorporated in these pastures are leased by Sieben Live Stock (Figure 2). This grazing system has greatly benefited both the BTWMA and the cooperators' lands involved, improving vegetative conditions for wildlife species, especially elk. This grazing system remains in place today with a lease expiring in 2018. It is proposed to continue this 3-pasture system as a second part of this larger proposed lease as described for another six years (2019 - 2024).

Watersheds included in the area are Cottonwood, Elkhorn and Tyrrell Creeks. The area and its vegetative composition have been previously described by Pyrah, 1985, in *Livestock Grazing Potential on a Wildlife Management Area - the Beartooth WMA*. Legal descriptions of the BTWMA land included in this proposal are listed in Appendix A. Total size of the Cow Camp grazing system is about 21,440 acres, including the following:

Table 5. BTWMA Staunten Cow Camp Cattle Stocking Rates, 1992 - Present.

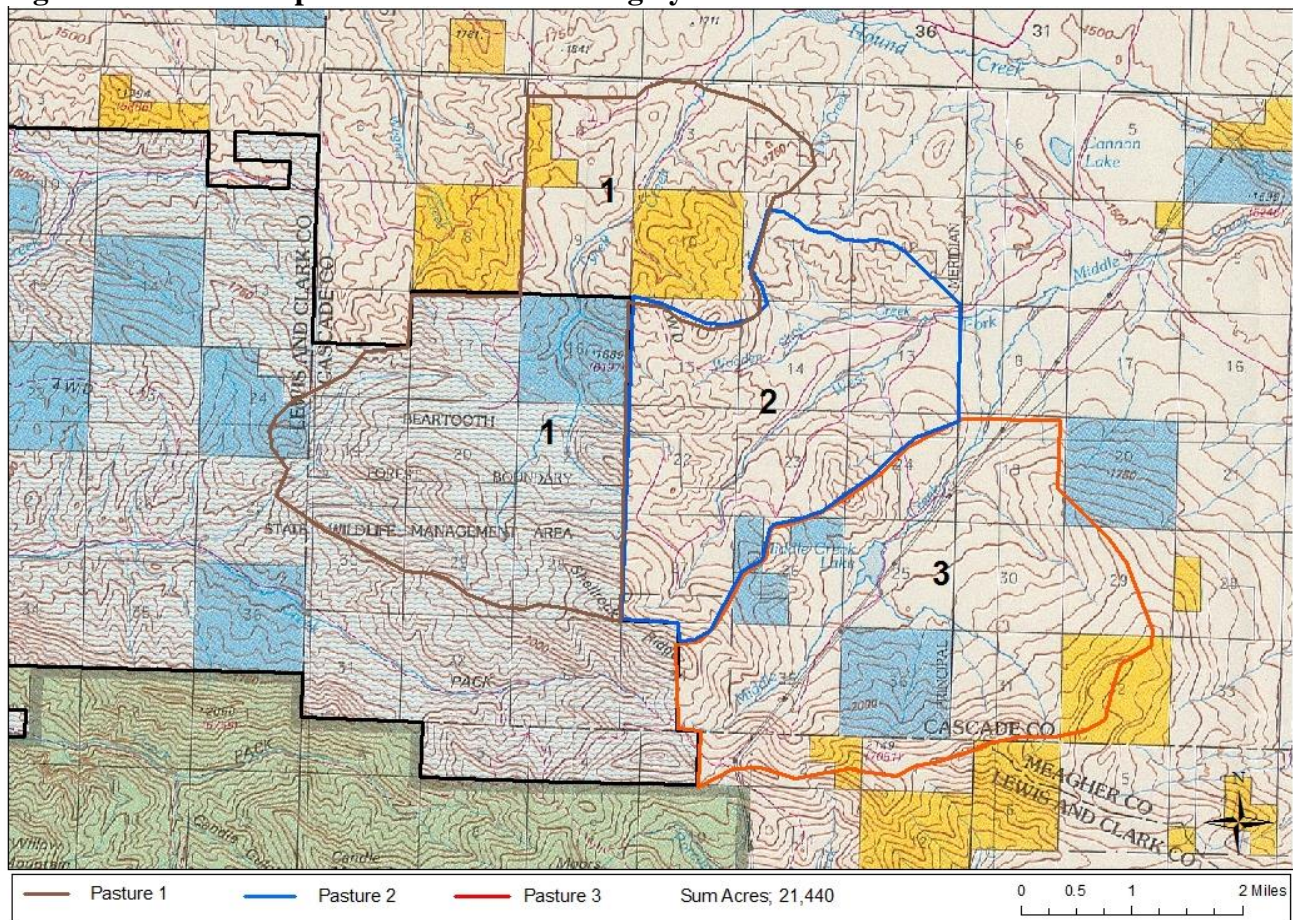
Year	Dates of Use	AUM's	Days of Use	AUM's/acre ¹	Acres/AUM ¹	% AUM's Allowed ²	Grazing Fee
1992	5/21 – 8/25	2,125	97	.43	2.3	61%	\$10,624.00
1993	8/2 – 9/30	578	60	.12	8.6	33%	\$5,780.00
1994	Rested						N/A
1995	6/21 – 8-/30	1,645	68	.33	3.0	47%	\$8,225.00
1996	7/27 – 9/29	1,204	66	.24	4.1	69%	\$7,826.00
1997	Rested						N/A
1998	6/1 – 9/1	1,584	86	.32	3.1	45%	\$10,296.00
1999	8/3 – 9/29	1,224	57	.25	4.1	70%	\$7,956.00
2000	Rested						N/A
2001	5/29-8/31	1,830	93	.42	2.7	52%	\$13,725.00

2002	8/1-9/27	1,375	58	.27	3.6	61%	\$10,312.50
2003	Rested						N/A
2004	6/28-8/31	1,536.5	64	.31	3.2	44%	\$11,523.75
2005	8/10-10/6	1,882	57	.39	2.6	108%	\$14,115.00
2006	Rested						N/A
2007	6/15 – 7/30	1,482.5	45	.30	3.3	42%	\$11,119.00
2008	8/1 – 9/11	2,348	42	.47	2.1	134%	\$17,610.00
2009	Rested						N/A
2010	6/9 – 7/28	1,944	49	.39	2.55	55%	\$14,580
2011	7/29 – 9/2	1,048	35	.21	4.73	60%	\$7,860
2012	Rested						N/A
2013	6/11 – 7/1	1,744	27	.35	2.84	50%	Exchange of Use
2014	7/30 – 8/29	1,020	31	.21	4.86	58%	Exchange of Use
2015	Rested						N/A
2016	5/30 – 8/25	1,289	57	.25	3.85	37%	Exchange of Use
2017	8/2 – 8/29	1,008	27	.20	3.47	58%	Exchange of Use
2018	Rested						N/A

¹ Based on 4,960 acres in Beartooth WMA pasture

² Based on maximum of 3,500 AUMs in full season, 1,750 AUMs in post-seed ripe grazing years

Figure 3. “Cow Camp” Rest Rotation Grazing System Pasture Locations.



An average monthly stocking rate is indicated based on available forage and water supply, pasture size and layout, desired grazing effectiveness and previously observed effectiveness of livestock grazing abilities in the immediate area. Using turn-on and turn-off dates and seed ripe as reference points (May 15, August 31 and July 15 respectively), each pasture could provide the following measured grazing capacity in any one year (unit of measure = animal unit month):

Full season grazing (A) = 3,500 AUM's

Seed ripe grazing (B) = 1,750 AUM's

Complete Rest (C) = 0 AUM's

Table 6. Proposed Sequence of grazing treatments and pasture numbers, 2019-2024.

P A S T U R E #	YEAR						
		2019	2020	2021	2022	2023	2024
	1	A	B	C	A	B	C
	2	B	C	A	B	C	A
	3	C	A	B	C	A	B

Treatments

A = May 15 – July 15

B = July 15 – September 1

C = Complete Rest

Pasture 1-- 8,160 acres (FWP + SLS Tyrrell Creek)

Pasture 2-- 6,880 acres Sieben Live Stock (Wooden Shoe + Dog Cr)

Pasture 3-- 6,400 acres Sieben Live Stock (Middle Creek Basin)

SUM = 21,440 acres (15,600 SLS / 4,960 FWP / 800 BLM / 800 DNRC)

Flexibility is critical in effective operation of a grazing system of this magnitude and of such public interest. While certain dates, stocking rates and pasture layouts are represented as actual planned events and timing, each is subject to alteration given prudent examination of on-the-ground events as the program evolves. Climatological events and their influence upon plant phenology will dictate adjustments in grazing schedules, as will actual livestock distribution predict the uniform level of grazing treatment and stocking rate throughout an entire pasture. Only the actual grazing scheme (including absolute rest periods) is held inviolate and not subject to change.

One result of livestock grazing is the reduction of standing dead grass litter and promotion of succulent new re-growth. Elk regularly utilize grazed areas, especially during spring and fall green-up periods. The rest-rotation grazing system also improves forage conditions on the private land involved, promoting landowner tolerance of elk utilizing private land. Although monthly surveys are not conducted on elk on the BTWMA, observations indicate elk utilize the grazed areas year-round, especially during spring, summer and fall months due to the mostly north facing aspects of BTWMA pastures. The grazing unit gives elk and other wildlife a wider variety of grass conditions to choose from, since the majority of the BTWMA is excluded from cattle grazing and receives only light to moderate grazing by big game animals.

During initial setup of the grazing system in the 1990's, FWP and Sieben Live Stock installed six water tanks within the BTWMA pasture to provide better cattle distribution in the uplands and to reduce cattle use

of the Tyrrell Creek riparian area. This has worked very well to better distribute cattle throughout the pasture when in use. In 2008, four more stock tanks were installed on the BTMWA pasture by FWP and Sieben Live Stock to further improve cattle distribution. Elk, deer and other game and non-game species continue to benefit from the increased water availability. Wildlife friendly escape ladders were installed in all FWP stock water tanks. In 2003 and 2006 an aspen stand cattle exclosure fence was constructed to keep livestock (but allow wildlife) from utilizing the stand (Exhibit 1). Size of this aspen exclosure is about 10 acres.

Exhibit 1. Aspen stand cattle exclosure August 2017.



HABITAT GRAZING SYSTEM STIPULATIONS

The proposed six-year grazing lease renewal would use similar grazing schematics as the expiring lease. This system used cow/calf pairs in the past to achieve grazing objectives and will most likely continue to do so. This does not prohibit the lessee from using yearlings in place of cow/calf pairs to achieve the same desired results. Dates of grazing use will be dictated by 1) plant phenology to include spring green-up and plant availability and 2) forage consumption in the active pasture and 3) hunting and recreational demands upon the area (out of BTWMA by Sept 1 due to archery seasons). It is expected that general season dates for these events will approximate the following: May 20 – July 15 for full season grazing, July 15 – August 31 for post seed ripe grazing. Followed by a third year of complete rest. All pastures in the rest rotation grazing plan continue to have 2 growing seasons of rest (one full season) per 3-year grazing cycle (Table 6).

The lessee will be required to provide labor and materials to install temporary electric poly wire fence on pasture boundaries where permanent fence does not exist to implement the grazing system. Temporary electric fence may also be used to prevent overuse of riparian areas when pastures are scheduled for grazing.

The lessee will also be responsible for both temporary and permanent fence maintenance in the pastures, cattle movement during active grazing seasons, and prevent and remedy trespass livestock problems if they arise. The lessee will be required to maintain all livestock watering systems and to pay the costs of operating such. The lessee may access the area via motorized travel from neighboring private lands to conduct such activities. After each grazing rotation, the lessee will be required to remove the temporary electric fence each of those years within 3 days after cattle are removed from the pasture.

PUBLIC ACCESS

In exchange for grazing FWP lands involved in this proposed lease (Beartooth WMA), Sieben Live Stock also agrees to continue to allow reasonable free public hunting on their deeded lands during Fish and Wildlife Commission approved seasons. Sieben Live Stock has been enrolled in FWP's Block Management Program since the programs' inception. Sieben Live Stock has 68,400 acres enrolled in FWP's Block Management Program and provides at least 1,500 public hunter days annually for all big game species and sexes and is a model Landowner to area sportspeople.

SPECIAL CONDITIONS

As per FWP's WMA Grazing Lease Payment Schedule Guidelines, this proposed lease agreement would fall under the "Exchange of Use" or a fee of \$0.00 per AUM. Criteria used to determine this fee is that as part of FWP's standard grazing rotation, the lessee effectively exchanges resting 1 pasture of private land (C Treatment) for use of 1 pasture of WMA land (A or B Treatment) every 2 of 3 years. On the 3rd year, the lessee does not exchange rest, but maintains structured grazing treatments (A and B treatments), but FWP receives the value of having the WMA pasture rested (C Treatment) —OR— As a direct exchange of grazing for rest, the lessee is trading a yearlong rest treatment on private land for a grazing treatment of equal value on the WMA. In either of the two scenarios, the lessee's payment is in grass instead of cash. Exchange of Use Fee = \$0. The intent of \$0 Exchange of Use is NOT to expand the herd size through grazing on the WMA. It is instead to use the WMA as an incentive for managing livestock grazing in a manner that meets wildlife objectives. The WMA grazing lease incorporates private lands that provide important wildlife habitat values (as determined by FWP) and comprises a significant portion of the total grazing system (i.e., the private land supports two of the three grazing treatments annually and/or involves annual rest on private land in return for a similar amount of grazing on the WMA). The lessee also provides services and maintenance that at least meet minimums required to qualify for the low grazing rate as set forth in FWP's Grazing Lessee Responsibilities Document. Following these FWP guidelines in this proposed lease, the lessee provides almost 75% of the land base in the proposed lease agreement (deeded and public leases). With this proposed lease, FWP is able to maintain and/or enhance wildlife and fishery habitats on and additional 28,500 acres adjacent to the Beartooth WMA. Thus, the lessee would qualify for the Exchange of Use Fee = \$0.00

Salting, and/or mineral grounds will be the responsibility of the lessee. Salt/mineral grounds shall be placed at locations mutually agreed upon by the lessee and FWP. Sites are to be moved periodically to locations agreed upon by both parties. Spring/water developments will be considered on an as-needed basis and will be approved on any WMA lands upon agreement of both parties as in past leases.

The BTWMA / Sieben Live Stock Grazing System plan (Exhibit B) and lease document would be employed during the term of this lease. Other contingencies may apply to Bureau of Land Management (BLM) and Department of State Lands (DNRC) leases which are the responsibility of the lessee.

MONITORING/PUBLIC INVOLVEMENT:

Trends in vegetation composition and livestock use would continue to be monitored via photo plots and/or photos. Monitoring will be a cooperative effort by the FWP Area Biologist and Range Specialist. Owing to the keen public interest in the area, its resources and accessibility, public education and informational efforts may be necessary to showcase the grazing pastures. In 2016, 23 photo points were established in the Whitetail Prairie portion of the BTWMA by FWP Area Biologist and Range Specialist. Grazing transects are also located in the “Cow Camp” area and Sieben Live Stock lands. These photo points and transects will continue to be monitored to ensure wildlife and fishery habitats are maintained and/or enhanced through time. The expiring grazing system is currently meeting and exceeding objectives of both FWP and Sieben Live Stock Company.

Livestock grazing on publicly owned FWP Wildlife Management Areas can sometimes draw attention from recreational users and environmental groups. Owing to the keen public interest on this WMA, its resources and accessibility, public education and information has been, and continues to be necessary. These efforts include contact with the public via media outlets, public meetings and informal contacts with the public that utilize the BTWMA during summer months and hunting seasons. The Devil’s Kitchen Management Team, along with sporting groups such as Montana Sportsman Alliance, Russell Country Sportsmen, Rocky Mountain Elk Foundation, Mule Deer Foundation and Great Falls Chapter Safari Club International will also continue to be a vital part in public communication efforts for this grazing proposal. Previous discussions on habitat manipulation techniques and wildlife management efforts on the WMA have received much support from these groups.

Grazing tours have been offered and provided in the past to sportspeople, Landowners, Grazing County Commissioners, FWP Foundation, F&W Commissioners, Legislators, Russell Country Sportsmen, Russell Country Backcountry Horsemen, East Front Backcountry Horsemen, MT Stockgrowers Association, Rocky Mountain Elk Foundation, Great Falls Chapter SCI, Montana Sportsmen Alliance and the Devil’s Kitchen Working Group, to name a few, with full endorsement. Grazing tours are annually conducted for the summer Devil’s Kitchen Working Group meeting. In 2010, a range and elk management tour of the BTWMA and Sieben Live Stock lands was provided to the Ranch Management Consultants: Executive Link Program with 95 people attending from CA, CO, ID, KS, MO, MT, NE, NV, OR, TX, UT, WA, WY and Mexico.

An Environmental Assessment will be open for public review and comment for 30 days, resulting in the production of a Decision Notice from the FWP Region 4 Supervisor based on public input. The Decision Notice will be offered to the Fish & Wildlife Commission for a final decision to approve/disapprove the proposal at their regularly scheduled meeting April 19, 2018.

Appendix A. Legal description of FWP lands included in proposed grazing system.

Appendix B. FWP minimum standards for grazing.

Appendix A. Legal description of FWP lands included in the proposed grazing system:

“Cow Camp” Pastures

Lewis & Clark County:

T14N R01W

- Sect 16
- Sect 17
- Sect 18 (S 1/2)
- Sect 19
- Sect 20
- Sect 21
- Sect 28 (N 1/2)
- Sect 29 (N 1/2)
- Sect 30 (N 1/2)

T14N R2W

- Sect 24 (NE 1/4 SE 1/4 and E 1/2 NE 1/4)

“Cottonwood, Whitetail Prairie, Wegner” Pastures

Lewis & Clark and Cascade Counties:

T14N R01W

- Sect 18 (NW 1/4 SW 1/4)

T14N R02W

- Sect 1
- Sect 2 (N 1/2)
- Sect 9 (E 1/2 NE 1/4 NE 1/4)
- Sect 10 (N 1/2)
- Sect 11 (S 1/2 N 1/2)
- Sect 12 (E 1/2)
- Sect 13 (E 1/2)
- Sect 24 (NE 1/4)

T15N R02W

- Sect 25
- Sect 26 (S 1/2)
- Sect 35
- Sect 36

APPENDIX B. FWP MINIMUM STANDARDS FOR GRAZING LIVESTOCK

Introduction

The following grazing standards represent the minimum required by FWP of a landowner who reserves the right to pasture and graze livestock (private and public land). These standards apply to all FWP funded projects; at times it may be necessary to provide more rest from grazing than described as minimum to meet specific wildlife or fisheries habitat objectives. The minimum is most frequently applied (without additional adjustment for wildlife and fisheries needs) on projects like conservation easements and Upland Game Bird Habitat Enhancement Projects where the property remains in private ownership and agricultural use remains the primary objective. On FWP WMAs, wildlife production and habitat conservation are the primary objective and when livestock grazing occurs it is not unusual for the amount of rest from livestock grazing to exceed that required by the minimum standard. Also, on some areas where wildlife production is the primary objective, grazing intensity may be reduced to a level significantly lower than allowable by the minimum standard. These standards are designed to address management of both upland and riparian landforms.

Why a minimum standard?

Livestock grazing is the predominant land use in Montana. As the state's primary fish and wildlife management agency, FWP is actively involved with livestock grazing as it influences fish and wildlife habitats throughout Montana. About 2.4 million cattle are maintained in Montana. Livestock grazing occurs on

about 69% of the state's land surface. Potential impacts to fish, wildlife and their habitats caused by grazing are well documented in the literature. Also well documented are potential benefits for conservation that can be derived for some wildlife species through carefully planned livestock grazing strategies.

Conserving wildlife habitat while continuing livestock grazing typically requires management strategies that differ from those employed for the sole purpose of maintaining a sustainable livestock forage base that maximizes livestock production. One reason for the difference in management strategies is because vegetation is much more than a forage base for wildlife. Vegetation species composition, structure, and diversity are important aspects of cover essential to the survival and production of wildlife. Healthy riparian communities are critical not only for aquatic species but for proper channel and flood plain function.

Seventy-five percent of all Montana wildlife species rely on riparian areas for all or a portion of their live. This includes many species covered in the FWP's Comprehensive Fish and Wildlife Strategy. When livestock grazing occurs, it is not unusual for cover to be the population limiting factor for many species. Aldo Leopold referred to this concept of habitat quality as 'Quality of Landscape'.

Addressing cover is especially important in implementation of FWPs Comprehensive Fish and Wildlife Strategy. It is therefore possible that a livestock operator may be employing a grazing strategy that maintains a sustainable forage base on most of the property, but may not be providing adequate forage, cover, or floral diversity for important fish and wildlife species.

Sustainable livestock production often employs grazing strategies emphasizing production and maintenance of grass species while placing less emphasis on the maintenance of forbs and woody plants. Many wildlife species require grazing strategies that emphasize healthy woody plants and availability of forbs and grass seed heads on at least portions of the landscape every year. The maintenance of robust woody vegetation and cover is also a very important component of healthy riparian systems. Healthy ecological systems are essential for a variety of aquatic and terrestrial riparian obligates.

The purpose of FWP's minimum grazing standards is to achieve a balance between maintaining sustainable agriculture and quality fish and wildlife habitat on working ranches yet provide flexibility to conserve and protect habitat needs where they are the primary objective and agriculture is secondary. FWP has applied the standard successfully over the past 30 years on a variety of projects ranging from working cattle ranches to FWP WMAs. There are examples in Montana and other states where a grazing standard similar to FWP's is being applied by livestock operators independent of FWP.

Grazing Plan

Prior to grazing livestock the Landowner and FWP must agree upon and implement a grazing plan. A grazing plan includes a map of the pastures, a grazing formula specific to those pastures, the class of livestock, and other information pertinent to the management of livestock. Format for the grazing plan is included as part of the management plan template for conservation easements. The grazing plan will be included as part of the Management Plan for

easement projects, and will define the limits and extent to which grazing may occur. The Management Plan may be amended by mutual consent, as more particularly described in Paragraph II.E. of the Conservation Easement. For other projects the management plan will be included as an attachment to the grazing lease or contract. On conservation easements the grazing plan will be enforceable only on lands covered by the easement.

Upland Minimum Grazing Standard for Summer/Fall Systems

This standard applies to upland pastures in native plant communities (i.e. generally on soils that have never been plowed) and for all riparian pastures. The grazing plan must meet or exceed minimum levels of periodic rest from livestock grazing to allow native plants adequate opportunity to reproduce and replenish root reserves. The minimum amount of rest required for any pasture grazed in one year during the plant growing season is defined as rest throughout the following year's growing season (i.e. grazing deferred until seed-ripe), followed by one year of yearlong rest, as shown in Table 1. Each pasture receives only one grazing treatment per year, and the treatments are rotated annually as shown in Table 1. The growing season is defined as beginning with the period of rapid plant growth (generally early to mid-May) until seed-ripe for the latest maturing native grasses, such as bluebunch wheatgrass or western wheatgrass (generally early August). Because the exact dates can vary as much as a few weeks depending on the location in Montana, specific dates for livestock movement are developed for each project. Occasionally it may be necessary for the grazing system to allow for some livestock to be in the pasture scheduled for

the A treatment (Table 1) beyond the growing season.

A three-pasture grazing system is used as an example (Table 1) to show how the landowner might typically rotate livestock through pastures to meet the minimum levels and required sequence of rest from livestock grazing. In practice, the landowner is not limited to any particular number of pastures; many projects include more than three pastures. In some instances, sub-pastures are employed to meet riparian or other objectives on the land. If livestock are grazed, they must be moved through the pastures in compliance with these standards and the grazing plan. Where grazing occurs during the growing season, the three-treatments outlined in Table 1 are essential and the total number of pastures and/or sub-pastures will vary between projects.

Table 1. Livestock Grazing Formula using a three pasture approach as an example.

Grazing Seasons	Pasture 1	Pasture 2	Pasture 3
Year One	A	B	C
Year Two	B	C	A
Year Three	C	A	B
<i>When all treatments have been applied to all pastures, the grazing rotation begins again at year one.</i>			
A = livestock grazing allowed during the growing season; B = livestock grazing begins after seed-ripe time; C = rest from livestock grazing yearlong.			

Winter and/or Early Spring Grazing

In some situations, an early grazing treatment (prior to mid- May) may be considered. However, it must be kept in mind that grazing capacity and forage production in the year a pasture is grazed from winter to beyond mid-May, will be temporarily reduced. On projects where early spring grazing (prior to rapid plant growth) is combined with summer (active growing season) grazing the three grazing treatments described in Table 1 must be employed.

It is usually more efficient to manage winter grazing separately from spring-summer grazing. If livestock are to be grazed in a native range or riparian pasture in winter or early spring (generally December through early May), and a separate grazing formula is required, it must be coordinated with the summer-fall grazing system as follows: Minimum required rest in pastures where livestock are grazed and/or fed hay during winter is one winter of rest in every two (2) years. Hay, grain, salt, protein or other supplements will not be placed in riparian areas during winter or any other season. Minimum required rest in pastures where livestock are grazed in spring, prior to early May, is one spring of rest in every two years. Any pastures grazed later in spring than early-mid May require the greater amount of rest shown in the table 1. As a minimum, when grazing is limited to winter or the non-growing season period, a two-pasture alternate use approach is frequently used. The area designated for winter grazing is divided into two pastures and each year one pasture is grazed during winter months and the other rested and use is alternated from year to year.

During winter months cattle tend to concentrate in wooded areas (shrub or tree-dominated areas) for shelter. This must be kept in perspective when assessing the impacts to woody vegetation. It is often the case that with careful placement of hay, cattle impacts to woody vegetation can be kept to a small portion of the area. If this is not the case, it might be necessary to fence a portion of the woody vegetation to protect it from damage, but should only be done once efforts to control livestock distribution by other means have proven ineffective. An acceptable level of impact will vary depending on the objectives (i.e. a level of

woody vegetation impact acceptable for a working cattle ranch may be much different than for a WMA).

Scope

The goal is to include as much of the lands under easement as possible within the grazing system, but one must be realistic in recognizing the animal husbandry needs of a livestock operation. It may be necessary to set aside small areas as animal husbandry units to be used at the landowner's discretion. Such areas might include calving pastures, branding pastures, sorting pens, bull pastures, or holding corrals. As long as the majority of the lands involved are within a grazing system, meeting the minimum standards, this is acceptable.

Non-native Pasture

It is common for livestock operators to have pastures on their land that are non-native range. The landowner's goal is usually to keep these pastures productive as non-native pasture. The pastures typically are seeded with an exotic pasture grass or grass mix. On occasion forbs like dry-land alfalfa are included in the planting. The FWP minimum grazing standard does not apply to these pastures. In cases of non-native pasture a grazing strategy that is coordinated with the grazing system and meets the needs of the ranch should be worked out. In the case of crested wheatgrass pasture it may be necessary to allow grazing early (late-winter or early spring) each year to maintain palatability. In the case of other pasture grasses, such as smooth brome, a deferred approach works well; a pasture is grazed during the growing season in year one then deferred from grazing until near seed-ripe in year 2 (about the time such

grasses would normally be harvested as hay). This will maintain the productivity of the non-native species until replanting is necessary and in some cases maintain them as attractive feeding sites for large wild ungulates. It is important to keep in mind that these areas, unlike native range, are essentially cropland and whether grazed or left idle will eventually need some sort of agricultural practice to maintain their productivity.

It is usually best to leave irrigated pasture management to the landowners discretion. If important riparian is included in the field it might be necessary to fence the riparian zone from the irrigated pasture to protect it from livestock grazing. Usually grazing strategies employed on irrigated pasture are not consistent with proper management of key native riparian plants. In such situations it may be necessary to apply the guideline *Series entitled: The Need for Stream Vegetated Buffers Parts 1 through 3*, Montana Department of Environmental Quality 2008.

Livestock operators often place cows in hayfields during winter months. In such cases the field should be managed at the landowner's discretion and in some instances it might be necessary to fence out riparian from the hayfield to protect it from grazing.

Stocking Rate

Usually FWP does not require a maximum stocking rate as part of the grazing strategy on easements or Upland Game Bird Habitat Enhancement Projects. In such cases it is clearly stated in the grazing plan, that the maximum stocking rate will be ultimately determined by the operators ability to conform to the grazing

system. In other words the livestock numbers may increase as long as the plan can be followed and livestock movement dates are not compromised. Such an approach is consistent with the reality that, for most easement projects, the primary use of the land is agricultural.

Occasionally a landowner has requested that an upper limit stocking rate be established as a stipulation in the easement. As long as the number of livestock is realistic this is not a problem.

On lands owned by FWP any grazing that occurs will be at stocking levels determined by the agency and approved by the FWP Commission.

Mineral and Other Supplements

On privately owned grazing lands the landowner is given more discretion on locations for placement of mineral block than on FWP lands. However, regardless of land ownership the placing of mineral block within riparian areas will be strongly discouraged. On FWP lands the placement of mineral block will be described as part of the grazing plan. Supplements will be placed away from riparian areas, ponds, and roads. Rocky (stable soil) areas on ridge tops or in the trees are preferred sites.

On FWP lands livestock within pasture grazing systems are not to be fed hay.

Flexibility

Rarely, a severe environmental influence (i.e. fire, drought, grasshoppers) may require a one time deviation from the prescribed grazing plan. In such cases the landowner is to notify the local FWP representative of the problem. In a timely manner the local FWP representative, Habitat Section representative, and

landowner will meet to discuss the issue and work out a solution. It is important to keep in mind that short term adjustments to the grazing plan must be the exception rather than the rule. Allowing grazing to occur in a pasture scheduled for rest is always a last resort. FWP has managed grazing systems across Montana through a variety of severe environmental events. This experience has shown that when a legitimate problem exists an alternative can usually be found that avoids grazing the pastures scheduled for rest.